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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ROBERT L. WILDE,)
16 Plaintiff,) Case No. 2:13-CV-01401-JCM-CWH
17 v.)
18 CAROLYN W. COLVIN,)
19 Acting Commissioner of Social Security,)
20 Defendant.)
21

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

22 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
23 (Commissioner), by and through her counsel, Daniel G. Bogden, United States Attorney, and Blaine
24 Welsh, Assistant United States Attorney, to request a thirty (30) day extension of time to respond to
25 Plaintiff's Motion for Reversal from February 14, 2014 to March 17, 2014. This is Defendant's first
26 request for an extension.

On February 4, 2014, counsel for the Commissioner contacted Plaintiff's counsel, Marc V. Kalagian, who stated he had no objection to the Commissioner's request for an extension.

The instant motion is not intended to cause intentional delay and is requested due to work load issues which have arisen due to the shutdown of the federal government. At the end of the day on September 30, 2013, the appropriation that had been funding the Department of Justice expired and the

1 appropriations to the Department lapsed. The same was true for most Executive agencies, including
2 the Social Security Administration. Effective October 17, 2013, funds were appropriated for the
3 Department of Justice and the Social Security Administration, and attorneys in both offices are
4 resuming their usual civil litigation functions.

5 Notwithstanding the return of all attorneys, the Office of the General Counsel for the Social
6 Security Administration has a substantial backlog of work as a result of this lapse in appropriations.
7 The Office of the General Counsel is working diligently to prioritize and work through this backlog as
8 efficiently as possible. As such, Defendant requests a 30-day extension of time for filing the
9 responsive brief, with all other dates in the Court's Special Scheduling Order to be extended
10 accordingly.

11 Date: February 4, 2014 Respectfully submitted,

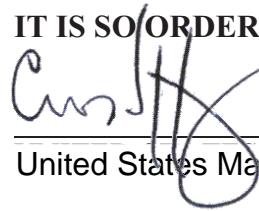
12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Blaine T. Welsh
15 BLAINE T. WELSH
16 Assistant United States Attorney

17 OF COUNSEL:

18 TINA SALADINO
19 Assistant Regional Counsel
20 Social Security Administration

21 IT IS SO ORDERED:

22 
23 United States Magistrate Judge

24 DATED: February 5, 2014